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Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; DOES I-  
X; ROE Business Entities I-X; Mark  
Broadhurst; Mike York; and Chase Swanson,  
Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Joint Motion for 30-Day Stay of Deadlines

The Parties, Defendant K-Kel, Inc. (“K-Kel”), and individual defendants Mark Broadhurst (“Broadhurst”), Chase Swanson (“Swanson”) and Mike York (“York”) (together “Individual Defendants”) (collectively with “Defendants”), and Plaintiff Julie Hanna (“Hanna” and/or “Plaintiff”), by and through their undersigned counsel, Fisher & Phillips LLP, Law Office of Mitchell S. Bisson, Gilbert Employment Law, and Kemp & Kemp, hereby jointly move this Court for a thirty (30) day stay of all upcoming deadlines. This Motion is based upon the pleadings on file herein, the following Memorandum of Points and Authorities, and any argument of the record herein.

DATED this 23rd day of June, 2022.

FISHER & PHILLIPS, LLP

/s/ Allison Kheel, Esq.

Scott M. Mahoney, Esq.

Allison L. Kheel, Esq.

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*Attorneys for Defendants, K-Kel, Inc., Mark*

*Broadhurst and Chase*

*Swanson*

GILBERT EMPLOYMENT  
LAW, P.C.

/s/ Gary M. Gilbert, Esq.

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*Attorneys for Plaintiff*

LAW OFFICES OF MITCHELL S.  
BISSON

/s/ Mitchell Bisson, Esq.

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Las Vegas, NV 89128

*Attorney for Michael York*

### **MEMORANDUM OF POINTS AND AUTHORITIES**

On May 13, 2022, the Parties advised the Court that they had reached a settlement in principle and requested a 30-day stay of upcoming deadlines to allow them to finalize their written settlement agreement. ECF No. 80. On June 13, 2022, the Court granted the Parties' request, thus staying this matter from May 13, 2022 to June 12, 2022. ECF No. 81. The Parties have been diligently working to finalize their settlement agreement and require an additional, brief stay of deadlines to complete this process. The Parties intend to promptly file a joint request for dismissal of this matter once the settlement agreement has been executed by all Parties. Therefore, the Parties respectfully request this matter be stayed for another 30 days, from June 12, 2022 to July 12, 2022. Good cause exists for this request and neither party will be prejudiced by this request.

Respectfully Submitted,

FISHER & PHILLIPS, LLP

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*Attorney for Michael York*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

June 28, 2022

Dated: \_\_\_\_\_.

KEMP & KEMP

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